

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	Case No. 04-CR-10298-DPW
	)	
v.	)	
	)	
MARKO BOSKIC	)	
_____	)	

**DEFENDANT'S MOTION FOR A JUROR QUESTIONNAIRE,  
A PRELIMINARY INSTRUCTION TO JURORS,  
INDIVIDUAL VOIR DIRE, AND VOIR DIRE QUESTIONS**

Defendant Marko Boskic hereby requests that the Court:

- utilize a juror questionnaire;
- give a preliminary instruction prior to voir dire to the jury venire concerning the nature of this case;
- allow individual voir dire out of the presence of other jurors;
- ask the voir dire questions proposed by the defendant.

In support of these requests, defendant states:

1. Although this is a false statements case, the government will be doing everything in its power to try this case as if it were a war crimes/murder case. At a minimum, the jury will be hearing evidence of the mass execution of hundreds of Muslim men and boys. The evidence will be gruesome and horrifying.

2. A questionnaire will help identify issues for voir dire and will quickly identify jurors who will need to be excused for cause. It will aid greatly in the selection of a jury that will

be able to fairly evaluate complicated legal claims amidst evidence that is likely to engender a highly emotional response. The questionnaire defendant proposes to use is attached hereto as Attachment A.

3. Defendant has drafted a Proposed Preliminary Statement to be read to the jury venire prior to voir dire. A copy of that proposal is attached hereto as Attachment B.

4. Defendant requests that after the parties have had an opportunity to review the responses to the questionnaire, that the Court conduct individual voir dire of each potential juror out of the presence of the other potential jurors. Individual voir dire is necessary so that the potential jurors will be able to respond honestly, and without embarrassment, to questions about their ability to judge the evidence fairly and impartially.

5. Defendant requests that the Court include the Proposed Voir Dire Questions, attached hereto as Attachment C, in its individual voir dire of the potential jurors.

Respectfully submitted,

/s/ Patricia Garin  
Max D. Stern  
BBO NO. 479560  
Patricia Garin  
BBO No. 544770  
Stern, Shapiro, Weissberg  
& Garin, LLP  
90 Canal Street, Suite 500  
Boston, MA 02114-2022  
(617) 742-5800

Dated: June 12, 2006

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